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*Attorneys for Defendant ABN AMRO Bank N.V.
(presently known as The Royal Bank of Scotland
N.V.)*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,
v.

ABN AMRO BANK N.V. (presently known as
THE ROYAL BANK OF SCOTLAND, N.V.),

Defendant.

Hearing date: **March 29, 2017**
Hearing time: **10:00 a.m.**
Opposition date: **March 22, 2017**

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05354 (SMB)

**NOTICE OF MOTION OF ABN
AMRO BANK N.V. (presently known
as THE ROYAL BANK OF
SCOTLAND, N.V.) FOR THE ENTRY
OF AN ORDER PURSUANT TO
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 8002(d) FOR AN
EXTENSION OF TIME TO FILE A
NOTICE OF APPEAL AND MOTION
FOR LEAVE TO APPEAL**

PLEASE TAKE NOTICE that ABN AMRO Bank N.V. (presently known as The Royal Bank of Scotland, N.V.) (“RBS/ABN”), will present a motion under Federal Rule of Bankruptcy Procedure 8002(d) for an extension of time to file a notice of appeal and a motion for leave to appeal in the above-captioned adversary proceeding (the “Motion”), annexed hereto, and the proposed order granting the relief sought therein (the “Proposed Order”), annexed thereto as Exhibit A, to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York for approval and signature on **March 29, 2017 at 10:00 a.m.**.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion or the Proposed Order shall (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the Southern District of New York; (iii) specify the name of the objecting party and state with specificity the basis of the objection(s) and the specific grounds therefor; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with proof of service and a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein, One Bowling Green, New York, New York 10004; and (v) be served upon each of the following: (a) counsel to RBS/ABN, Allen & Overy LLP, 1221 Avenue of the Americas, New York, New York 10020, Attn: Michael S. Feldberg, Esq.; (b) counsel to Irving H. Picard, Trustee for the substantively consolidated estate of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff, Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111; Attn: David J. Sheehan, Esq. so as to be received no later than **March 22, 2017**.

PLEASE TAKE FURTHER NOTICE that unless written objection to the Motion or Proposed Order, with proof of service as set forth above, is filed with the Clerk of the Court by **March 22, 2017**, there may not be a hearing and the order may be signed. Counsel for RBS/ABN has conferred with counsel for the Trustee and the parties have stipulated and agreed that the Trustee does not oppose the relief sought in the Motion and consents to the entry of the Proposed Order attached to the Motion.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will hear the Motion, along with any written objection timely received, on a date to be determined at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408 before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: March 14, 2017
New York, New York

Respectfully submitted,

ALLEN & OVERY LLP

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